U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 1, 2023

BY ECF AND EMAIL
Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

> Re: *United States v. Nashean Folds*,
>   **16 Cr. 505 (NRB)**

Dear Judge Buchwald:

The Government submits this letter to respectfully request that chronologies maintained by the United States Probation Office ("Probation") detailing Nashean Folds's supervision, as well as any relevant communications and photographs, be unsealed. As Your Honor is aware, the pending violation of supervised release involves three specifications relating to a domestic incident that are expected to proceed to a hearing (Specifications 2, 3, and 4). Given the nature of the specifications, the Government anticipates calling one or more Probation Officers to testify at the hearing scheduled for April 11.

The chronologies, communications, and photographs maintained by Probation contain material relevant to the hearing, and the Government understands that they may be unsealed only upon a Court order. In addition, once in possession of the files, the Government must disclose them to the defendant pursuant to Title 18, United States Code, Section 3500 and/or pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S.

150 (1972). Accordingly, the Government respectfully requests that the chronologies and relevant communications and photographs be ordered unsealed.

Respectfully submitted,
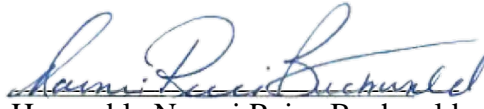
DAMIAN WILLIAMS
United States Attorney

By: s/_____
Jeffrey Coyle / Lara Pomerantz
Assistant United States Attorneys

cc: Counsel of Record (by ECF)

Application granted.

Dated: New York, New York
        March 7, 2023

SO ORDERED:

Honorable Naomi Reice Buchwald
United States District Judge